

REMARKS

The Office Action dated January 8, 2007, has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1, 39 and 41 have been amended to more particularly point out and distinctly claim the subject matter of the invention. No new matter has been added, and no new issues are raised which require further consideration and/or search. Claims 1-33, 35, 36 and 41 have been allowed. Claims 38-40 are submitted for consideration.

The disclosure was objected to on the grounds that priority data should be included on page 1 of the specification. The disclosure has been amended to overcome this objection. Therefore, Applicant requests that this objection be withdrawn.

The abstract is objected to on the grounds that "Fig. 1" on line 28 should be deleted. The abstract has been amended to overcome this objection. Therefore, Applicant requests that this objection be withdrawn.

Claims 1 and 41 were objected to on the grounds that there are two semicolons after "second mobile communication network." Claims 1 and 41 have been amended to overcome this objection. Therefore, Applicant requests that this objection be withdrawn.

Claim 39 was rejected under 35 U.S.C. 112, second paragraph, as being indefinite. Claim 39 has been amended to overcome this rejection. Therefore, Applicant requests that this rejection be withdrawn.

Claims 37-40 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,697,354 to Borella (hereinafter Borella) or U.S. Patent Publication No. 2003/0134650 to Sundar (hereinafter Sundar). The rejection is traversed as being based on references that neither teach nor suggest the novel combination of features clearly recited in claims 37-40.

Claim 37, upon which claims 38 and 39 depend, recites a mobile station configured to register with a second mobile communications network and to register with a connection management entity. The mobile station is used to subscribe to a first mobile communication network and is enabled to roam in a second mobile communication network. The mobile station includes means for converting a destination party number into a number of a connection management entity provided in association with the second mobile communication network. The connection management entity interfaces with a third communications network and is arranged to provide a communications link between the first and second mobile communications networks via the third communications network such that the normal call routing between the first and second mobile communication networks is bypassed.

Claim 40 recites a connection management entity for a mobile communications network, the connection management entity being arranged to register a mobile station roaming with, and registered with, the mobile communications network and to communicate with another connection management entity provided in association with a

second mobile communication network via a third communications network. The connection management entity is arranged to provide a connection for the roaming mobile station by means of a communications link set-up between the first and second mobile communications networks via the third communications network.

As outlined below, Applicant submits that the cited references of Borella or Sundar do not teach or suggest the elements of claims 37-40.

Borella discloses that a roaming mobile node listens for mobile IP "agent advertisement" messages from foreign agents. When the roaming mobile node receives an agent advertisement message from a foreign agent indicating that it is now on a foreign subnet, the mobile node registers with the foreign agent and its home agent, indicating that the mobile node has roamed away from its home subnet.

Borella further discloses that a correspondent with a router receives data packets for the mobile node from the external network. The correspondent is, for example, a network access service provider being used by mobile node. The correspondent sends data packets for the mobile node to the mobile node's home agent. Assuming that the mobile node has roamed to the foreign subnet and has registered its current location, for example, on foreign subnet and on the home subnet, the home agent creates a "virtual tunnel" to the foreign agent 216 via external network. As is known in the art, a virtual tunnel can be created by encapsulating a data packet inside another data packet by adding additional tunnel packet headers. See at least figured 15 and 16 and Col. 19, lines 27-35 and Col. 20, lines 16-39 of Borella.

Sundar discloses that a method and apparatus for internetworking a mobile station to operate in a wireless wide area network (WWAN) environment and in a wireless local area network (WLAN) environment. A switch is provisioned to communicate with a WLAN via IP communication and to communicate with a PBX via a PBX interface. The switch receives mobile station communications via the WLAN. The switch converts the mobile station communications to a format compatible with the PBX interface and forwards the converted communications to the PBX. The PBX receives and handles the converted communications. In one embodiment, the switch is further provisioned to communicate with a WWAN and the switch analyzes the mobile station communications and determines that the communications address an entity external to a domain of the PBX. In response, the switch requests a temporary local directory number (TLDN) from a MSC serving the WWAN. In response to receiving a TLDN from the MSC, the switch sends a message to the PBX to connect the mobile station call to the specified TLDN. The PBX connects the mobile station call to the specified TLDN. The mobile station may roam during the call and switch to WWAN air interface protocol. The mobile station reconnects to the call by specifying the TLDN of the call. See at least the Abstract.

Applicant submits that neither Borella nor Sundar teaches or suggest the combination of features recited in claims 37-40. Claim 37, in part, recites converting a destination party number into a number of a connection management entity to which the mobile station is registered, the connection management entity routing a call via a third communications network in response to a request such that the normal call routing

between the first and second mobile communication networks is bypassed. Claim 40 recites a similar limitation. Borella does not teach this feature. Instead, Borella discloses that figure 16 shows that the actual routing path is between the home subnet and the foreign subnet via the external network. There is no teaching or suggestion in Borella of converting a destination party number into a number of a connection management entity to which the mobile station is registered, as recited in claims 37 and 40. There is also no teaching or suggestion in Borella of bypassing normal call routing between the first and second mobile communication networks by using a third communications network, as recited in claims 37 and 40.

Sundar also does not teach or suggest converting a destination party number into a number of a connection management entity to which the mobile station is registered, the connection management entity routing a call via a third communications network in response to a request such that the normal call routing between the first and second mobile communication networks is bypassed, as recited in claims 37 and 40. Sundar merely teaches that a switch is provisioned to communicate with a WLAN via IP communication and to communicate with a PBX via a PBX interface and to convert information from the WLAN to information understood by the PBX. Sundar further discloses that the switch is further provisioned to communicate with a WWAN and the switch analyzes the mobile station communications and determines that the communications address an entity external to a domain of the PBX. In Sundar, the switch requests a temporary local directory number (TLDN) from a MSC serving the WWAN,

and in response to receiving a TLDN from the MSC, the switch sends a message to the PBX to connect the mobile station call to the specified TLDN and the PBX connects the mobile station call to the specified TLDN. However, Sundar fails to teach or suggest converting a destination party number into a number of a connection management entity to which the mobile station is registered, the connection management entity routing a call via a third communications network in response to a request such that the normal call routing between the first and second mobile communication networks is bypassed, as recited in claims 37 and 40. Based on the discussion above, Applicant respectfully asserts that the rejection under 35 U.S.C. §102(e) should be withdrawn because neither Borella nor Sundar, whether taken singly or combined, teaches or suggests each feature of claim 37 and hence, dependent claims 38-40 thereon.

As noted previously, claims 37-40 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office Action. It is therefore respectfully requested that, in addition to allowed claim 1-33, 35, 36 and 41, claims 37-40 be allowed and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



Arlene P. Neal
Registration No. 43,828

Customer No. 32294
SQUIRE, SANDERS & DEMPSEY LLP
14TH Floor
8000 Towers Crescent Drive
Tysons Corner, Virginia 22182-2700
Telephone: 703-720-7800
Fax: 703-720-7802

APN:kzw